

April 1, 2005

BY EMAIL

Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

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OFC. OF THE SECRETARIAT

Re: Certification: New York Mercantile Exchange, Inc.
Submission #05.56 (Listing of Additional Strike Prices for the
Gold, Copper, Unleaded Gasoline, Natural Gas, Heating Oil, Crude Oil,
Gasoline Crack, Heating Oil Crack, Heating Oil Average Price and
Related Calendar Spread Option Contracts)

Dear CFTC Commissioners:

Pursuant to COMEX Rule 15.03(c), COMEX Rule 17.04 and NYMEX Rule 300.20, the President of the New York Mercantile Exchange, Inc. ("Exchange") has directed that additional strike prices be added for certain contract months in the Gold, Copper, Unleaded Gasoline, Natural Gas, Heating Oil, Crude Oil, Gasoline Crack, Heat Oil Crack, Heating Oil Average Price and related Calendar Spread option contracts as detailed below:

- (A) On March 29, 2005, the Exchange added a call and a put:
1. at the strike prices of 18700, 19200, 19400 and 20300 for the July 2005 contract month of the Unleaded Gasoline option contract;
 2. at the strike price of 9300 for the November 2005 contract month of the Natural Gas option contract;
 3. at the strike price of 13000 for the December 2005 contract month of the Natural Gas option contract;
 4. at the strike prices of 7950 and 9300 for the December 2005 contract month of the Natural Gas option contract;
 5. at the strike price of 9300 for the March 2006 contract month of the Natural Gas option contract;

(B) On March 30, 2005, the Exchange added a call and a put:

6. at the strike price of -85 for the May 2005 contract month of the Crude Oil One month Calendar Spread option contract;

7. at the strike price of 164 for the May 2005 contract month of the Copper option contract;

8. at the strike price of 20900 for the July 2005 contract month of the Unleaded Gasoline option contract;

9. at the strike price of 9600 for the September 2005 contract month of the Natural Gas option contract;

10. at the strike price of 13500 for the January 2006 contract month of the Natural Gas option contract;

(C) On March 31, 2005, the Exchange added a call and a put:

11. at the strike price of 146 for the May 2005 contract month of the Copper option contract;

12. at the strike price of 18200 for the May 2005 contract month of the Heating Oil option contract;

13. at the strike price of 1350 for the May 2005 contract month of the Heating Oil Crack option contract;

14. at the strike price of -110 for the May 2005 contract month of the Crude Oil One month Calendar Spread option contract;

15. at the strike price of 1550 for the June 2005 contract month of the Gasoline Crack option contract;

16. at the strike price of 7400 for the June 2005 contract month of the Crude Oil option contract;

17. at the strike price of 20400 for the July 2005 contract month of the Unleaded Gasoline option contract;

18. at the strike price of 152 for the September 2005 contract month of the Copper option contract;

19. at the strike price of 19900 for the September 2005 contract month of the Unleaded Gasoline option contract;

20. at the strike price of 18100 for the September 2005 contract month of the Heating Oil Average Price option contract;

21. at the strike price of 8850 for the October 2005 contract month of the Natural Gas option contract;

22. at the strike price of 18100 for the October 2005 contract month of the Heating Oil Average Price option contract;

23. at the strike price of 18100 for the November 2005 contract month of the Heating Oil Average Price option contract;

24. at the strike price of 13000 for the November 2005 contract month of the Natural Gas option contract;

25. at the strike price of 8550 for the December 2005 contract month of the Natural Gas option contract;

26. at the strike price of 13000 for the January 2006 contract month of the Natural Gas option contract;

27. at the strike price of 13000 for the March 2006 contract month of the Natural Gas option contract;

28. at the strike price of 9000 for the June 2006 contract month of the Natural Gas option contract;

29. at the strike price of 21600 for the July 2006 contract month of the Unleaded Gasoline option contract;

(D) On April 1, 2005, the Exchange added a call and a put:

30. at the strike price of 20300 for the May 2005 contract month of the Unleaded Gasoline option contract;

31. at the strike prices of 18600, 18800 and 19200 for the May 2005 contract month of the Heating Oil option contract;

32. at the strike price of 18100 for the May 2005 contract month of the Heating Oil Average Price option contract;

33. at the strike price of 24000 for the June 2005 contract month of the Unleaded Gasoline option contract;

34. at the strike price of 7700 for the June 2005 contract month of the Crude Oil option contract;

35. at the strike prices of 18100 and 18400 for the June 2005 contract month of the Heating Oil Average Price option contract;

36. at the strike price of 18400 for the July 2005 contract month of the Heating Oil Average Price option contract;

37. at the strike prices of 19100, 19700 and 22100 for the July 2005 contract month of the Unleaded Gasoline option contract;

38. at the strike price of 18400 for the August 2005 contract month of the Heating Oil Average Price option contract;

39. at the strike price of 18800 for the August 2005 contract month of the Unleaded Gasoline option contract;

40. at the strike price of 9800 for the August 2005 contract month of the Natural Gas option contract;

41. at the strike price of 110 for the September 2005 contract month of the WTI One month Calendar Spread option contract;

42. at the strike price of 8600 for the December 2005 contract month of the Natural Gas option contract;

43. at the strike price of 17400 for the December 2005 contract month of the Unleaded Gasoline option contract;

44. at the strike price of 12500 for the January 2006 contract month of the Natural Gas option contract;

45. at the strike price of 8600 for the March 2006 contract month of the Natural Gas option contract; and

46. at the strike price of 510 for the June 2006 contract month of the Gold option contract.

Pursuant to the terms of COMEX Rule 15.03(c), COMEX Rule 17.04 and NYMEX Rule 300.20, the strike prices noted above are in increments that are consistent with the pricing for the underlying futures contract. COMEX Rule 15.03(c), COMEX Rule 17.04 and NYMEX Rule 300.20 permit such directed strike prices to be effective upon adoption, provided that notice to the CFTC is given within three business days of the strike price listing.

Should you have any questions concerning the above, please contact the undersigned at (212) 299-2207.

Very truly yours,

Brian Regan
Vice President & Counsel

cc: Christopher K. Bowen
George Henderson
Michael Campanelli
Donna Talamo